

**USDA Child Nutrition Programs
Administrative Review Summary Report**

School Food Authority: Random Lake School District **Agency Code:** 59-4641

School(s) Reviewed: Random Lake Elementary

Review Date(s): 12/19/16 – 12/21/16

Date of Exit Conference: 12/21/16

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Random Lake School District for the courtesies extended to us during the on-site review. Thank you to the Food Service Director for being available when answering questions and providing additional information when necessary. The Food Service Director was very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

1. The lunch claim was validated and was consolidated correctly.
2. The free and reduced applications were well documented. The Food Service Director followed up with households to clarify any questions she had on the applications and documented the correspondence on the applications.

Comments/Technical Assistance/Compliance Reminders

1. The check off sheets used for breakfast in the classroom for the breakfast claim were very difficult to read. This resulted in an under claim for the November breakfast claim. The Head Cook does a good job going back and talking to teachers to clarify the check off sheets. However, this did not help enough to prevent an under claim. The Food Service Director has had meetings with the teachers about the check off sheets not being clear enough. Going forward, it is recommended to have the teachers enter in the reimbursable breakfasts served directly into Infinite Campus. This will eliminate any issues with the check off sheets.
2. Of the 239 students on the benefit issuance list, 179 students were part of the statistical sampling. There were two applications determined incorrectly.
3. Verification was completed in a timely manner, before the November 15th deadline. As a reminder, you may start Verification as of October 1. The total number of applications determined free or reduced on file as of October 1 should be multiplied by .03 to calculate the number of applications needed to pull for Verification.

Findings and Corrective Action Needed

☐ **Finding #1:** One application was determined reduced and should have been denied because the child income and seasonal income was not applied to the total income.

Corrective Action Needed:

- Please notify each household, whose benefits will be decreased from reduced to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the benefit status in the software system when the 10 calendar days are up.
- Indicate the date of correction (date you sent the denial letter) on the SFA-1 form left on-site for each of the corresponding students and submit a copy of the completed SFA-1 form with corrective action.
- This was completed on-site. No further action required.

☐ **Finding #2:** One application was determined reduced and should have been free because the household number listed on the application was 5. However, the household number used was 4, which qualified them for the benefit.

Corrective Action Needed:

- Please notify the household, whose benefits will be increased from reduced to free, effective immediately.
- Indicate the date of correction (date you sent the letter) on the SFA-1 form left on-site for each of the corresponding students and submit a copy of the completed SFA-1 form with corrective action. Be sure to change the benefit status in the software system no later than 3 days from today.
- This was completed on-site. No further action required.

❑ **Finding #3:** An application chosen for Verification was verified incorrectly. The household listed the wrong income frequency on the application that the Verifying Official was not aware of and did not take this into account when examining the Verification documentation submitted by the household. The household was approved for reduced meals originally, but should have been changed to paid after the Verification process.

Corrective Action Needed:

- Please notify each household, whose benefits will be decreased from reduced to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect.
- Indicate the date of correction (date you sent the denial letter) on the SFA-2 form left on-site for each of the corresponding students and submit a copy of the completed SFA-2 form with corrective action. Be sure to change the benefit status in the software system when the 10 calendar days are up.
- This was completed on-site. No further action required.

2. MEAL PATTERN AND NUTRITIONAL QUALITY**Commendations and Appreciations**

Sincere thanks to the Food Service Director and the school nutrition professionals of Random Lake Elementary School. We appreciate your time and efforts spent preparing for and participating in the on-site review. Customer service to students was exemplary. The operation was clean and well-maintained. School nutrition professionals encouraged students to try the fruits and vegetables and demonstrated excellent rapport with students at all grade levels. Well done!

Technical Assistance and Program Requirement Reminders**Production Records**

The production record template includes the required information; however, all sections must be filled in completely each day. Actual number of servings prepared was frequently left blank on lunch production records. The number of servings planned, used, and leftovers sections were frequently left blank on breakfast production records. Daily production records show portion sizes of meal components were appropriately planned and served. Please continue to work with all staff members to record planned usage, actual usage, and leftovers.

Weight versus Volume

For crediting purposes, please ensure weight and volume are not being used interchangeably. Scoops and spoodles measure fluid ounces, not ounces by weight. For example, it is not appropriate to use a #8 scoop or a 4 ounce spoodle for an intended 4 ounce (by weight) serving. To ensure that students are receiving the planned amount, weigh the food item, then determine which scoop will hold that weight. With regards to the Land O Lakes macaroni and cheese, please ensure a one-third cup serving contains three ounces by weight in order to credit as one ounce equivalent meat/meat alternate and one-half ounce equivalent grains.

Corrective Action

Finding: Production records are not filled in completely.

Required Corrective Action: Please submit production records for two days with all sections, including actual milk usage by type, filled in completely.

3. RESOURCE MANAGEMENT

Commendations

The 16-17 Paid Lunch Equity Tool was well done. The 17-18 PLE tool will be released within the next month and available for use.

Comments/Technical Assistance/Compliance Reminders

1. The Resource Management Risk Assessment Tool was completed with 1 flag. A comprehensive review of non-program foods was required.
2. Random Lake School District has a Negative Account Balance Policy. In case it will be revised, here is some guidance:

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a “Nutshell”: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf> . For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script

4. GENERAL PROGRAM COMPLIANCE

Commendations

1. The And Justice For All poster is hanging in the cafeteria next to the most recent food safety inspection. This is a great spot for both of these items.
2. The school provides water and cups for the students to get water at lunch. This was a fantastic way to get students to drink water at lunch.
3. The Food Safety plan was well done and had all of the required components minus the SOP for Breakfast in the Classroom.
4. The first Food Safety Inspection was completed in October and the next inspection will be after the New Year sometime.
5. On-site monitoring forms were completed prior to February 1 and well documented.

Comments/Technical Assistance/Compliance Reminders

1. The incorrect shortened USDA non-discrimination statement was used for a program form. This was corrected on-site to have the entire USDA non-discrimination statement.
2. Work on updating the Breakfast in the Classroom SOP for the Food Safety plan.
3. Professional Standards is being well documented for all employees. To make it easier for the Food Service Director, it is recommended to have a google sheet to allow all employees to enter in their training information so the Food Service Director does not need to.
4. Be sure to retain all check off sheets and documentation regarding the School Nutrition Programs for 3 years plus the current year.

5. OTHER FEDERAL PROGRAMS REVIEWS

Commendations

1. The Afterschool Snack Program was reviewed within the first 4 weeks of operation and well documented.
2. The Food Service Director does a nice job letting families know about summer meals available. An email blast is sent out to all families.

Comments/Technical Assistance/Compliance Reminders

1. The Afterschool Snack Program claim resulted in an under claim. It is a recommendation to use Infinite Campus to mark students off for taking a complete snack to eliminate under claims from occurring.
2. The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

The Wellness Policy should include:

- a. Specific measurable goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness.
- b. Nutrition guidelines to promote student health and reduce childhood obesity for all foods available in each school district.
- c. At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process.
- d. Inform and update the public (including parents, students, and others in the community) about the content and implementation of local wellness policies on school website, social media, newspaper, or newsletters.
- e. Document public involvement, public updates, policy leadership, and evaluation plan.
- f. SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy.
- g. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis. Some methods of notification include mailing flyers, newsletters, emails, website postings, and newspaper articles.

A summary of the requirements can be found at:

https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.



With School Nutrition Programs!